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March 25, 2008

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*LIMITED TO MATTERS AND PROCEEDINGS
BEFORE FEDERAL COURTS AND AGENCIES

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: **IT&E Overseas, Inc.**
Docket 96-45
2008 ETC Compliance Report

FILED/ACCEPTED
MAR 25 2008
Federal Communications Commission
Office of the Secretary

Dear Ms. Dortch :

IT&E Overseas, Inc. (IT&E), by its attorneys, hereby requests, pursuant to Sections 0.457(d) and 0.459 of the Commission's Rules, confidential treatment of the Service Quality Improvement Plan (Exhibit A) and the IT&E 2007 Expenditures (Exhibit C) in the IT&E 2008 ETC Compliance Report.

In support thereof, the following is shown:

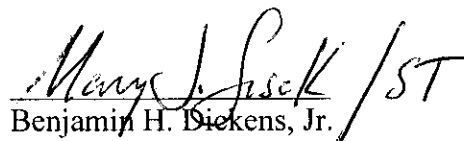
The information in Exhibits A and C concerns network planning and financial information for a competitive wireless carrier. As such, Exhibits A and C contain proprietary commercial, financial and technical data which is guarded from competitors and which is not released to the public. This information, which would otherwise not be released, is required to be submitted to the Commission in order for IT&E to maintain its ETC designation and receive federal universal service funds. The disclosure of this information could result in substantial competitive harm by disclosing IT&E's build out plans.

Accordingly, the information in Exhibits A and C should be accorded confidential treatment and not be made available to potential competitors.

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In the event that the instant request is to be denied, we request advance notice of and a stay of the release of Exhibits A and C for public inspection, until such time as an Application for Review of the determination is resolved. Disclosure of this information prior to final adjudication would prejudice IT&E and render any successful appeal moot.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary J. Sisak / ST". The signature is written in dark ink and is positioned above the printed name of Benjamin H. Dickens, Jr.

Benjamin H. Dickens, Jr.

Mary J. Sisak

Attorneys for
IT&E Overseas, Inc.

Attachment

IT&E OVERSEAS, INC.
2008 ETC COMPLIANCE REPORT

CONTENTS

- Section 1: Five-year service quality improvement plan § 54.209 (a)(1)
- Section 2: Detailed Outage Information §54.209(a)(2)
- Section 3: Unfulfilled Service Requests §54.202(a)(3)
- Section 4: Customer Complaints §54.209(a)(4)
- Section 5: Service Quality and Consumer Protection Certification §54.209(a)(5)
- Section 6: Ability to Remain Functional in Emergencies Certification §54.209(a)(6)
- Section 7: Description of Carrier's Local Usage Plan §54.209(a)(7)
- Section 8: Equal Access Certification §54.209(a)(8)

Section 1: Five-year service quality improvement plan § 54.209 (a)(1)

IT&E's service quality improvement plan is to continue to upgrade its telecommunications facilities and equipment as necessary to meet evolving service requirements and maintain high quality service throughout its service area. As a wireless service provider, IT&E upgrades and replaces facilities and equipment as necessary. IT&E will use any high-cost universal service amounts received by it to offset expenditures incurred as it continues to upgrade and replace facilities and equipment. IT&E's service quality improvement plan is attached hereto as "Confidential Exhibit A."

In addition, the Federal Universal Service Support IT&E received in 2007 is attached hereto as "Exhibit B" and IT&E's 2007 expenditures related to the provision, maintenance, and upgrading of its facilities and services is attached as "Exhibit C."

Exhibit A and Exhibit C are submitted as confidential as they contain company specific financial data and network planning information, and disclosure of the information contained therein could jeopardize IT&E's financial and competitive position.

Section 2: Detailed Outage Information §54.209(a)(2)

During 2007, IT&E experienced the following service outages that affected at least 10% of its end users for a period lasting more than 30 minutes.

Time	Description of Outage	Resolution	Service Affected	Geographic Areas Affected	Steps taken to prevent similar situation in the future	# of Customers Affected
1.5 hrs	Applications Processor (AP) down	Restored AP	CDMA	Islandwide	Traffic rerouted to additional antenna sites	40%
14:20 - 16:20	Call failure	Call Processor restarted	Prepaid system	Islandwide	System monitored by CPDI. Logs reviewed & scripts updated.	31%
20:45 - 22:00	Call failure	Call Processor restarted	Prepaid system	Islandwide	System monitored by CPDI. Logs reviewed & scripts updated.	21%
2 hrs	Island wide power problems	Power was stabilized	CDMA	Islandwide	Traffic rerouted to additional antenna sites	20%

- Notes:
1. GTA is the local exchange carrier providing T1 facilities to our antenna sites.
 2. In 2007 we upgraded our prepaid system to accommodate more customers and call features. Throughout the transition period it was necessary for CPDI (Communications Products Development, Inc.) to debug the new system several times.

Section 3: Unfulfilled Service Requests §54.202(a)(3)

IT&E was able to provide service to all potential customers that requested service during 2007.

Section 4: Customer Complaints §54.209(a)(4)

During 2007, IT&E received an estimated 15 customer complaints per 1,000 lines.

IT&E Customer Complaints - 2007

Description	# of complaints
Wireless Airtime Dispute / Complaint	71
Wireless Cancellation Fee Dispute / Complaint	208
Wireless Miscellaneous	5
Wireless Monthly Recurring Charge Dispute/Complaint	102
Wireless Roaming Dispute / Complaint	5
Wireless Coverage Issues	3
TOTAL	394

Date	# of lines reported to USAC in 2007
12/31/06	25,200
03/31/07	25,400
06/30/07	26,010
Ave.	25,537

Number of customer complaints per 1,000 lines: 15

Section 5: Service Quality and Consumer Protection Certification §54.209(a)(5)

IT&E complies with applicable FCC service quality standards and consumer protection rules and those contained in the CTIA's Consumer Code for Wireless Service. See Exhibit D

Section 6: Ability to Remain Functional in Emergencies Certification §54.209(a)(6)

IT&E has fortified its network to remain functional in emergency situations. Standard network reliability features include battery back-up power at most facilities as well as generators installed at all switching facilities and 65% of its cell site locations. Further, IT&E has portable generators that can be deployed for sustained outages. In addition, IT&E's network reliability is supported by redundancy measures. See Exhibit D

Section 7: Description of Carrier's Local Usage Plan §54.209(a)(7)

See Exhibit D

Section 8: Equal Access Certification §54.209(a)(8)

See Exhibit D

IT&E 2007 High Cost Division Disbursements

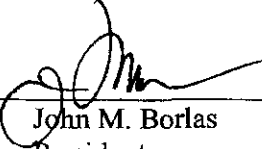
Year	Month	HCL	ICLS	Total
2007	Dec	\$28,932	\$186,645	\$215,577
2007	Nov	\$32,062	\$186,645	\$218,707
2007	Oct	\$44,779	\$186,645	\$231,424
2007	Sep	\$19,997	\$177,950	\$197,947
2007	Aug	\$17,861	\$177,950	\$195,811
2007	Jul	\$11,558	\$177,950	\$189,508
2007	Jun	\$19,969	\$138,921	\$158,890
2007	May	\$19,969	\$138,921	\$158,890
2007	Apr	\$14,191	\$138,921	\$153,112
2007	Mar	\$23,070	\$146,617	\$169,687
2007	Feb	\$23,070	\$146,617	\$169,687
2007	Jan	\$24,813	\$146,617	\$171,430
Annual Disbursement				\$2,230,670

RULE 54.209(a) (5), (6), (7), AND (8) CERTIFICATIONS

IT&E Overseas, Inc. (IT&E) hereby certifies that:

- a) it is complying with applicable service quality standards and consumer protection rules;
- b) it is able to function in emergency situations as set forth in Section 54.201(a)(2) of the rules;
- c) it is offering a local usage plan comparable to that offered by the incumbent LEC in the relevant service area; and
- d) it acknowledges that the Commission may require IT&E to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

This certification is made for the 2008 annual report.

By: 

John M. Borlas
President

Date: 3-13-08

DECLARATION UNDER PENALTY OF PERJURY

GUAM, U.S.A.)
)
Municipality of Tamuning)

I, John M. Borlas, President of IT&E Overseas, Inc., do hereby declare under penalty of perjury that the statements contained in the foregoing 2008 ETC Compliance Report are true and correct to the best of my knowledge, information and belief.



John M. Borlas
President
IT&E Overseas, Inc.

Dated: 3-13-08

Subscribed, Sworn to and acknowledged before me this 13th day of March, 2008.


Notary Public

DONNA M. PERRON
NOTARY PUBLIC
In and for Guam, U.S.A.
My Commission Expires: April 11, 2009
165 Marata St., #202, Tamuning, Guam 96913

